

\$100

CDJ

CDJ

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
(PHILADELPHIA DIVISION)

TRICIA MAUGE

Plaintiff,

vs.

UNIFUND CCR, LLC and
DISTRESSED ASSET PORTFOLIO III, LLC:

Defendants.

: COURT OF COMMON PLEAS
: CHESTER COUNTY

: CIVIL ACTION

17

4590

: DOCKET NO.: 2017-08592-MJ

: DEFENDANTS UNIFUND CCR, LLC
: AND DISTRESSED ASSET PORTFOLIO
: III, LLC'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §1441, Defendants/Petitioners Unifund CCR, LLC ("Unifund") and Distressed Asset Portfolio III, LLC ("DAP III") (collectively, "Defendants") seek removal to this Court. In support thereof, Defendants state as follows:

1. Defendants are the only two defendants in a civil action entitled *Tricia Mauge v. Unifund CCR, LLC, et al.*, Case No. 2017-08592-MJ. This action was filed in the Court of Common Pleas, Chester County, Pennsylvania.

2. Defendants were served with a Summons and Complaint in this action on September 13, 2017. A copy of the Summons and Complaint served on Defendants is attached as **Exhibit A**. Exhibit A includes all process and pleadings served upon Defendants. No further action has been taken in the Court of Common Pleas, Chester County, Pennsylvania.

3. This action involves a claim that Defendants violated the federal Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692 *et seq.*, by allegedly attempting to collect a debt that Plaintiff did not owe.

4. Because an action under the FDCPA is a civil action arising under the Constitution, laws, or treaties of the United States, the United States District Court has original

jurisdiction over this action pursuant to 28 U.S.C. § 1331. Therefore, removal of the action is appropriate pursuant to 28 U.S.C. § 1441.

5. This Notice of Removal is filed within 30 days after receipt by Defendants of a copy of the initial pleadings setting forth the claims for relief, by service of process or otherwise, and is timely filed pursuant to 28 U.S.C. § 1446(b).


6. Venue is proper in the Eastern District of Pennsylvania under 28 U.S.C. § 1441(a), because Chester County is served by the Eastern District of Pennsylvania.

7. Plaintiff has also asserted a state law claim for violation of the Pennsylvania Unfair Trade Practices Act and Consumer Protection Law (“UFTPL”). This Court should exercise jurisdiction over the pendent state law claim because (1) the federal FDCPA claim is a substantial federal claim sufficient to confer subject matter jurisdiction on the Court; (2) the state and federal claims derive from a common nucleus of operative fact; and (3) Plaintiff’s claims are such that they would ordinarily be expected to try them all in one judicial proceeding. *See Carnegie–Mellon Univ. v. Cohill*, 484 U.S. 343, 349, 108 S.Ct. 614, 618, 98 L.Ed.2d 720 (1988); *Local No. 1 (ACA) Broadcast Employees of International Brotherhood of Teamsters, etc. v. International Brotherhood of Teamsters*, 614 F.2d 846, 850 (3d Cir. 1980). Therefore, removal of the entire action is appropriate pursuant to 28 U.S.C. § 1441.

8. Notice of the filing of the notice of removal will be given to all parties and the Clerk of Court in accordance with 28 U.S.C. § 1446(d), and this Notice of Removal is being served per the Certificate of Service.

WHEREFORE, Defendants/Petitioners Unifund CCR, LLC and Distressed Asset Portfolio III, LLC respectfully request that this action be removed to this Court.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'ACB', is written over a horizontal line.

Adrienne C. Beatty, Esq.
Pa. I.D. No. 319403

DINSMORE & SHOHL LLP
1800 JFK Boulevard, Suite 100
Philadelphia, PA 19103
(215) 309-8877 phone / (215) 732-8999 fax
adrienne.beatty@dinsmore.com

*Attorney for Defendants Unifund CCR, LLC and
Distressed Asset Portfolio III, LLC*

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing Notice of Removal via Certified Mail, and have sent copies of such filing to the following via First Class Mail:

Fred Davis, Esq.
Davis Consumer Law Firm
500 Office Center Drive
Suite 400
Ft. Washington, PA 19034

Attorney for Plaintiff Tricia Mauge

A handwritten signature in black ink, appearing to be 'R. P.', is written above a horizontal line.

*Attorney for Defendants Unifund CCR, LLC
and Distressed Asset Portfolio III, LLC*



Debt Defense, Unfair Debt Collection, Lemon Law, Defective Consumer Products
WWW.USACREDITLAWYER.COM; TOLL-FREE:1-855-432-8475; EMAIL:fdavis@usacreditlawyer.com
CORPORATE HEADQUARTERS: 500 OFFICE CTR DR-SUITE 400-FT. WASHINGTON, PA 19034
***Board Certified by the New Jersey Supreme Court as a Civil Trial attorney
**Awarded "Rising Star" by Pennsylvania Superlawyer Magazine

September 7, 2017

Sent by First Class and Certified Mail

Unifund CCR, LLC
10625 Techwoods Circle
Cin, OH 45242

RE: Trichia Mauge v Unifund and Distressed Asset Portfolio III, LLC

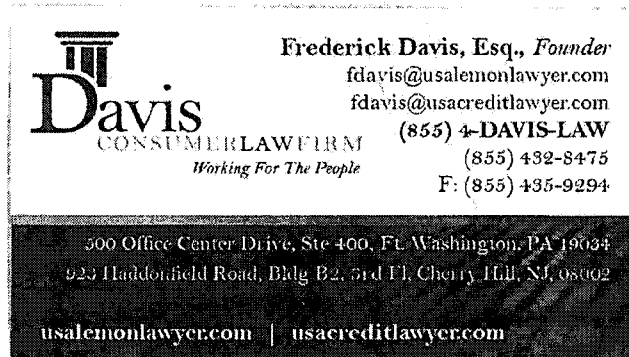
Dear Sir/Madam:

Please accept the enclosed in accordance with Pennsylvania Rule of Civil Procedure 403. Please be advised also that a responsive pleading is due within twenty days of receipt of this complaint. Please contact me if you would like to discuss a resolution of this matter prior to filing your Answer. I can be reached by email or phone at the numbers listed above.

Please also refrain from any contact with Mrs. Mauge or any third-parties regarding this or any other alleged debts and instead communicate exclusively through my office. Please also ensure that Mrs. Mauge's credit reports are updated to reflect the fact that this debt is disputed and that the actual dates of the alleged default/last account activity are listed.

Very Truly Yours,

Fréd Davis, Esq.



Supreme Court of Pennsylvania
Court of Common Pleas
Civil Cover Sheet
CHESTER County

For Prothonotary Use Only:

Docket No:

2017-08592-MJ

Filed and Attested by

PROTHONOTARY

05 Sep 2017 06:53 PM

K. Hume

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

Commencement of Action

☒ Complaint ☐ Writ of Summons ☐ Petition
☐ Transfer from Another Jurisdiction ☐ Declaration of Taking

Lead Plaintiff's Name:

TRICHIA MAUGE

Lead Defendant's Name:

UNIFUND CCR, LLC

Are money damages requested? ☒ Yes ☐ No

Dollar Amount Requested: ☒ Within arbitration limits
(check one) ☐ outside arbitration limits

Is this a Class Action Suit? ☐ Yes ☒ NoIs this an MDJ Appeal? ☐ Yes ☒ No

Name of Plaintiff/Appellant's Attorney: fred e davis, iv

Check here if you have no attorney(are a Self-Represented [Pro Se] Litigant)

Nature of the Case: Place "X" to the left of the **ONE** case category that most accurately describes your **PRIMARY CASE**.

If you are making more than one type of claim, check the one that you consider most important.

TORT(do not include Mass Tort)

☐ Intentional
☐ Malicious Prosecution
☐ Motor Vehicle
☐ Nuisance
☐ Premises Liability
☐ Product Liability(does not include mass tort)
☐ Slander/Libel/Defamation
☐ Other:

CONTRACT(do not include Judgments)

☐ Buyer Plaintiff
☐ Debt Collection: Credit Card
☐ Debt Collection: Other
☐ Employment Dispute:
Discrimination
☐ Employment Dispute: Other
☐ Other

CIVIL APPEALS

Administrative Agencies
☐ Board of Assessment
☐ Board of Elections
☐ Dept. of Transportation
☐ Statutory Appeal: Other
☐ Zoning Board
☐ Other:

MASS TORT

☐ Asbestos
☐ Tobacco
☐ Toxic Tort - DES
☐ Toxic Tort - Implant
☐ Toxic Waste
☐ Other:

REAL PROPERTY

☐ Ejectment
☐ Eminent Domain/Condemnation
☐ Ground Rent
☐ Landlord/Tenant Dispute
☐ Mortgage Foreclosure: Residential
☐ Mortgage Foreclosure: Commercial
☐ Partition
☐ Quiet Title
☐ Other:

MISCELLANEOUS

☐ Common Law/Statutory Arbitration
☐ Declaratory Judgement
☐ Mandamus
☐ Non-Domestic Relations
☐ Restraining Order
☐ Quo Warranto
☐ Replevin
☒ Other:

PROFESSIONAL LIABILITY

☐ Dental
☐ Legal
☐ Medical
☐ Other Professional

2017-08592-MJ

Chester County
Court of Common Pleas
Cover Sheet

Docket No:

2017-08592-MJ

Plaintiff(s): (Name, Address) <p align="center">TRICHIA MAUGE 6111 WALTON AVE. PHI, PA 19143</p>	Plaintiff's/Appellant's Attorney(circle one) (Name, firm, address, telephone and attorney ID#) <p align="center">fred e davis, iv (855) 432-8475 davis consumer law firm attorney ID#: 093907 500 Office Center Dr Suite 400 Ft. Washington, PA 19034</p>
Defendant(s): (Name, Address) <p align="center">UNIFUND CCR, LLC 10625 TECHWOODS CIRCLE CINCINNATI, OH 45242 DISTRESSED ASSET PORTFOLIO III, LLC 10625 TECHWOODS CIRCLE CINCINNATI, OH 45242</p>	Are there any related cases? Please provide case nos.
<p align="center">Defendants who are proceeding without counsel are strongly urged to file with the Prothonotary a written statement of an address AND a telephone number at which they can be reached</p>	
<p align="center">Commencement of Action (if applicable): <input type="checkbox"/> Agreement for an Amicable Action <input type="checkbox"/> Motion to Confirm Arbitration Award <input type="checkbox"/> Notice of Appeal</p>	
<p align="center">If this is an appeal from a Magisterial District Judgement, was appellant <input type="checkbox"/> Plaintiff or <input type="checkbox"/> Defendant in the original action?</p>	
<p align="center">Jury Trial Demanded <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p align="center">Nature of case if not on previous cover sheet - Please choose the most applicable</p>	
<input type="checkbox"/> Annulment <input type="checkbox"/> Custody - Conciliation Required <input type="checkbox"/> Custody - Foreign Order <input type="checkbox"/> Custody - No Conciliation Required <input type="checkbox"/> Divorce - Ancillary Relief Request <input type="checkbox"/> Divorce - No Ancillary Relief Requested <input type="checkbox"/> Foreign Divorce <input type="checkbox"/> Foreign Protection from Abuse <input type="checkbox"/> Paternity <input type="checkbox"/> Protection from Abuse <input type="checkbox"/> Standby Guardianship	<input type="checkbox"/> Writ of Certiorari <input type="checkbox"/> Injunctive Relief <input type="checkbox"/> Mechanics Lien Claim <input type="checkbox"/> Issuance of Foreign Subpoena <input type="checkbox"/> Name Change <input type="checkbox"/> Petition for Structured Settlement
<p>Arbitration Cases Only</p> <p>Arbitration Date <input type="text" value="2018-03-09"/></p> <p>Arbitration Time <input type="text" value="09:00:00"/></p> <p>Defendants are cautioned that the scheduling of an arbitration date does not alter the duty of the defendant to respond to the complaint and does not prevent summary disposition from occurring prior to the arbitration date.</p> <p>This matter will be heard by a Board of Arbitrators at the time and date specified but, if one or more of the parties is not present at the hearing, the matter may be heard at the same time and date before a judge of the court without the absent party or parties. There is no right to a trial <i>de novo</i> on appeal from a decision entered by a judge.</p>	<p>Notice of Trial Listing Date</p> <p>Pursuant to C.C.R.C.P. 249.3, if this case is not subject to compulsory arbitration it will be presumed ready for trial twelve (12) months from the date of the initiation of the suit and will be placed on the trial list one (1) year from the date the suit was filed unless otherwise ordered by the Court.</p> <p>To obtain relief from automatic trial listing a party must proceed pursuant to C.C.R.C.P. 249.3(b), request an administrative conference and obtain a court order deferring the placement of the case on the trial list until a later date.</p>

2017-08592-MJ

Fred Davis, Esq.
Identification No. 93907
DAVIS CONSUMER LAW FIRM
500 OFFICE CTR DR-STE 400
FT. WASHINGTON, PA 19034
(T)1-855-432-8475/(F)1-855-435-9294
fdavis@usacreditlawyer.com

ATTORNEY FOR PLAINTIFF

THIS IS AN ARBITRATION MAT
ASSESSMENT OF DAMAGES
HEARING IS REQUESTED.



TRICIA MAUGE
6111 Walton Ave
Phila, PA
19143

Plaintiff

v.

UNIFUND CCR, LLC
10625 Techwoods Circle
Cin, OH
45242

Defendant

And

DISTRESSED ASSET PORTFOLIO III,
LLC
10625 Techwoods Circle
Cin, OH
45242

Defendant

COURT OF COMMON PLEAS
CHESTER COUNTY

CIVIL ACTION

DOCKET NO.:

NOTICE TO DEFEND
CODE: 1900

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you.

You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

2017-08592-MJ

**YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU
DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR
TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU
CAN GET LEGAL HELP.**

CHESTER COUNTY BAR ASSOCIATION-LAWYER REFERRAL& INFO

SERVICE

Chester Bar Association
15 W Gay St #2,
West Chester, PA
19380

Phone: (610) 692-1889

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas de estas demandas expuestas an las paginas signientes, usted tiene veinte (20) dias de plazo al partir de ia fecha de la demanda y ia notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, le corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

**LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO
TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL
SERVICIO. VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA
CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR
DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.**

SERVICIO DE REFERENCIA LEGAL

Colegio de Abogados de Chester
15 W Gay St #2,
West Chester, PA
19380

Phone: (610) 692-1889

Fred Davis, Esq.
Identification No. 93907
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FT. WASHINGTON, PA 19034
(T)1-855-432-8475/(F)1-855-435-9294
fdavis@usacreditlawyer.com

Filed and Attested by
PROTHONOTARY
Sep 2017 06:53 PM
K. Hume

THIS IS AN ARB
MATTER. ASSESSMENT OF
DAMAGES HEARING IS
REQUESTED.

TRICIA MAUGE
6111 Walton Ave
Phila, PA
19143

Plaintiff

v.

UNIFUND CCR, LLC
10625 Techwoods Circle
Cin, OH
45242

Defendant

And

DISTRESSED ASSET PORTFOLIO III, LLC
10625 Techwoods Circle
Cin, OH
45242

Defendant

COURT OF COMMON PLEAS
CHESTER COUNTY

CIVIL ACTION

DOCKET NO.:

COMPLAINT

1. Plaintiff, TRICIA MAUGE, is an adult individual citizen and legal resident of the State of Pennsylvania, living at 2035 McKean St., Phila, Pa 19143.

2. Defendant, UNIFUND CCR, LLC, is a business corporation qualified to and regularly conducting business in, the Commonwealth of Pennsylvania, with its legal residence and principal place of business at 10625 Techwoods Circle, Cin, OH, 45242. Defendant can be served at that address.

3. Defendant, DISTRESSED ASSET PORTFOLIO III, LLC, is a

business corporation qualified to and regularly conducting business in, the Commonwealth of Pennsylvania, with its legal residence and principal place of business at 10625 Techwoods Circle, Cin, OH, 45242. Defendant can be served at that address.

4. Both Defendants regularly conduct “commerce” and “trade” within meaning of 73 P.S. § 201-2(3) and within the state of Pennsylvania and city of Philadelphia, and all conduct referenced herein was directed toward a resident of Philadelphia, Pennsylvania.

5. Plaintiff avers that at all times material hereto, Defendants acted by and through their authorized agents, servants, officers, and/or employees, including Defendant, all of whom were acting within the scope of their employment.

JURISDICTION AND VENUE

6. Jurisdiction of this court arises pursuant to 15 U.S.C. § 1692k(d), which states that such actions may be brought and heard before “any appropriate United States district court without regard to the amount in controversy, or in any other court of competent jurisdiction”.

7. Defendant regularly conducts business in the State of Pennsylvania and in the County of Chester, therefore, personal jurisdiction is established.

8. Venue is proper in Chester County pursuant to Pennsylvania Rule(s) of Civil Procedure 1006 and 2179.

9. Declaratory relief is available pursuant to 28 U.S.C. §§ 2201 and 2202.

PARTIES

10. Plaintiff is a natural person residing in Phila., PA. Some/all of the transactions comprising the alleged debt occurred in Chester County.

11. Plaintiff is a “consumer” as that term is defined by 15 U.S.C. § 1692a(3). The transactions comprising the alleged debt were for consumer related purchases, such as household goods, food, clothing, etc.

12. Defendant Unifund CCR, LLC is a “debt collector” as that term is defined by 15 U.S.C. §1692a(6), as its principal business is the collection of consumer related debts, and the alleged debt in questions stems from the acquisition of personal goods and services, such as household items, clothing, groceries, etc.

13. Defendant Distressed Asset Portfolio III, LLC is a “debt collector” as that term is defined by 15 U.S.C. §1692a(6), as its principal business is the acquisition and collection of consumer related debts.

14. Defendant Distressed Asset Portfolio III, LLC LLC is a “creditor” as that term is defined by 73 Pa. § CS 2270.4(b), as it regularly acquires consumer related debts on its own account and subsequently attempts collection.

FACTUAL ALLEGATIONS

15. Throughout the past year, Defendants have attempted to collect an alleged debt of \$811.71 which Defendant claimed it was collecting on behalf of co-Defendant “DISTRESSED ASSET PORTFOLIO III, LLC”. *See Exhibit “A”*.

16. Plaintiff alleges and avers that no debt is/was owed to Distressed Asset Portfolio III, LLC or “CITIBANK, N.A.” (the alleged original creditor), and Defendant Unifund CCR, LLC’ attempt to collect the alleged debt from Plaintiff, as well as Defendant Distressed Asset Portfolio III, LLC LLC’s alleged right to succeed by assignment of the alleged account, were unauthorized by law and/or contract, and

Defendants' conduct is thereby in violation of 15 U.S.C. §1692f(2).

17. Plaintiff alleges and avers that Defendants' repeatedly and continuously called Plaintiff telephonically, as well as unrelated third-parties, at irregular times and places, and often times failed to identify itself and inform Plaintiff of her rights, in violation of 15 U.S.C. §§ 1692c(a)(1) and d.

18. Plaintiff alleges and avers that Defendants communicated false credit information by failing to notify the major credit bureaus of the actual status/amount of the alleged "debt", in violation of 15 U.S.C. §1692e.

19. Plaintiff alleges and avers that Defendants' sought to collect amounts comprised largely of improper fees and/or interest, and Defendants' collection efforts were thus in violation of 15 U.S.C. §§1692e and f.

20. Plaintiff the statement within Defendants' letter fails to notify Plaintiff that both Defendants are one in the same, as they each occupy the same address, and that the litigation remised on the alleged debt is barred by the statute of limitations, and Defendants' letter thereby misrepresents the status and legal nature of the alleged debt, in violation of 15 U.S.C. 1692e(2) and f(1).

21. Plaintiff alleges and avers that there is no written agreement between Plaintiff and CITIBANK, N.A. permitting assignment of any debt to Distressed Asset Portfolio III, LLC, and Defendants' collection efforts are thus in violation of 15 U.S.C. §1692f(1).

22. Plaintiff alleges and avers that both Defendant's collection efforts surrounding this bogus debt caused Plaintiff to suffer material and ascertainable losses including, but it limited to: loss of time from work investigating the matter, time wasted attending to incessant communications, and all fees and costs associated with a legal investigation and prosecution of this matter.

COUNT I-AS TO BOTH DEFENDANTS
THE FAIR DEBT COLLECTION PRACTICES ACT ("FDCPA")

23. In its actions to collect a disputed debt, Defendants violated the FDCPA in one or more of the following ways:

- a. Harassing, oppressing or abusing Plaintiff in connection with the collection of a debt in violation of 15 U.S.C. § 1692d.
- b. Using misrepresentations or deceptive means to collect a debt in violation of 15 U.S.C. § 1692e(10).
- c. Using unfair or unconscionable means to collect a debt in violation of 15 U.S.C. § 1692f.
- d. By acting in an otherwise deceptive, unfair and unconscionable manner and failing to comply with the FDCPA.

WHEREFORE, Plaintiff, TRICIA MAUGE, respectfully prays for a judgment as follows:

- a. All actual compensatory damages suffered pursuant to 15 U.S.C. § 1692k(a)(1);
- b. Statutory damages of \$1,000.00 for each violation of the FDCPA pursuant to 15 U.S.C. § 1692k(a)(2)(A);
- c. All reasonable attorneys' fees, witness fees, court costs and other litigation costs incurred by Plaintiff pursuant to 15 U.S.C. § 1693k(a)(3); and
- d. Any other relief deemed appropriate by this Honorable Court.

COUNT TWO-AS TO BOTH DEFENDANTS
THE PENNSYLVANIA UNFAIR TRADE PRACTICES ACT AND CONSUMER
PROTECTION LAW ("UFTPL")

24. Plaintiff hereby incorporates all facts and allegations specified in paragraphs above, by reference as if fully set forth at length.

25. Plaintiff is a "Person" as defined by 73 P.S. § 201-2(2).

26. Defendants are "Person(s)" as defined by 73 P.S. § 201-2(2).

27. The Pennsylvania Unfair Trade Practices and Consumer Protection Act, 73 P.S. § 201-2(4), defines "unfair or deceptive acts or practices" to include the following:

(a) Causing likelihood of confusion or of misunderstanding as to the source, sponsorship, approval or certification of goods or services;

(b) Causing likelihood of confusion or of misunderstanding as to affiliation, connection or association with, or certification by, another;

(c) Engaging in any other fraudulent or deceptive conduct which creates a likelihood of confusion or of misunderstanding;

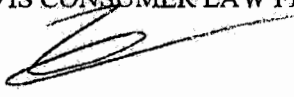
(d) Any violation of 73 Pa. Cons. Stat. Ann. § 2270.4, *et seq.*

28. Plaintiff alleges and avers that Defendants violated the Act by misrepresenting that any debt was owed, and further by claiming that improper fees and exorbitant charges were part of the alleged debt, and that Defendant's conduct complained of herein amounts to violations of the Fair Credit Uniformity Extension Act, 73 Pa. C.S. § 2270.4, et seq. and is thus a concomitant violation of the Unfair Trade Practices Act.

29. Plaintiff alleges and avers that Defendants violated the Act by misrepresenting that any debt was owed, and further by claiming that improper fees and exorbitant charges were part of the alleged debt.

30. The UTPCPL authorizes the Court, in its discretion, to award up to three (3) times the actual damages sustained for violations, and/or \$100.00 for statutory damages. Plaintiff avers entitlement to all actual and statutory damages, as well as written acknowledgement that no debt is owed, plus treble that amount, and attorney fees and costs, for Defendant's per se and statutory violations of Pennsylvania Law.

DAVIS CONSUMER LAW FIRM

By: /s/ 

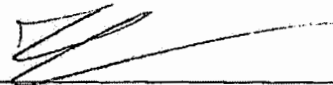
Fred Davis-PA ID# 93907
Attorney for Plaintiff, TRICIA MAUGE
500 Office Center Drive-Suite 400
Ft. Washington, PA 19034
Tel – 1-855-432-8475/Facsimile-1-855-435-9294
Email: fdavis@usacreditlawyer.com

V E R I F I C A T I O N

Fred Davis, states that he is the attorney for the Plaintiff herein; that he is acquainted with the facts set forth in the foregoing Complaint; that same are true and correct to the best of her knowledge, information and belief; and that this statement is made subject to the Penalties of 18 Pa. C.S.A. §4904, relating to unsworn falsifications to authorities.

DAVIS CONSUMER LAW FIRM

By: /s/



Fred Davis-PA ID# 93907
Attorney for Plaintiff, TRICIA MAUGE
500 Office Center Drive-Suite 400
Ft. Washington, PA 19034
Tel – 1-855-432-8475/Facsimile-1-855-435-9294
Email: fdavis@usacreditlawyer.com

EXHIBIT

“A”



PO Box 505
Linden MI 48451-0505
ADDRESS SERVICE REQUESTED

Y1E21355F3 2607



06/15/2017

#BWNKGZZ
#Y1E21355F3#
TRICHIA MAUGE
6111 Walton Ave
Philadelphia PA 19143-2213



Unifund CCR, LLC
10625 Techwoods Circle
Cincinnati, OH 45242

Original Creditor Account Number: 5424181085968084
Original Creditor: CITIBANK, NA
Original Creditor Address: CITIBANK CUSTOMER SERVICE PO BOX 6500, SIOUX FALLS, SD 57117
Current Creditor to Whom the Debt is Owed: DISTRESSED ASSET PORTFOLIO III, LLC

Dear TRICHIA MAUGE:

This letter is to inform you that Unifund CCR, LLC currently is servicing the above referenced account on behalf of the current owner, DISTRESSED ASSET PORTFOLIO III, LLC, with a balance of \$811.71. You may contact this office to address this matter by calling 888-384-8171.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days after receiving this notice that you dispute the debt, or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

Please note that a negative credit bureau report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations. This does not affect any other legal rights you might have. We will not report this debt to the credit reporting agencies until the expiration of the time period set forth above.

This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.

Sincerely,
Account Resolutions
Unifund CCR, LLC

* See reverse side for important information regarding your rights.

2017-08592-MJ

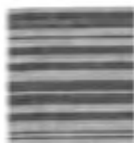
TD Davis Consumer Law Firm
140 Office Center Drive, Suite 400
Fort Washington, PA 19034
P: (855) 432-8473
F: (855) 433-9294
E: maria@macredlawyer.com
www.macredlawyer.com | www.mahoneylawyer.com



7017 0530 0000 8026 9484



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U.S. POSTAGE
PAID
SEP 16, 17
AUGUST
\$7.00
REGISTERED MAIL

~~United CCN LLC~~

United CCN LLC

10625 Techwoods Circle

Cin OH

45242



7017 0530 0000 8026 7491



Davis Consumer Law Firm
300 Office Center Drive, Suite 400
Fort Washington, PA 19034

F: (610) 432-8475

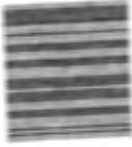
F: (610) 433-9234

E: dmorris@dmorrislawfirm.com

www.dmvdmorrislawfirm.com | www.dmvdmorrislawfirm.com



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45442

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